



September 29, 2020

Via ECF Filing

David J. Walton

Direct Phone 215-665-5547
Direct Fax 215-701-2110
dwalton@cozen.com

The Honorable Anita B. Brody
United States District Court
Eastern District of Pennsylvania
James A. Byrne United States Courthouse
601 Market Street, Room 7613
Philadelphia, Pennsylvania 19106

Re: Patricia McNulty v. The Middle East Forum, et al.
Docket No. 2:19-cv-05029-AB

Your Honor:

We represent the defendant Middle East Forum ("MEF") in this matter. Consistent with Your Honor's Policies and Procedures, we have made a good faith effort to resolve an ongoing discovery dispute with counsel for plaintiff Ms. Patricia McNulty, however, we have unfortunately not been able to do so. We respectfully request that Your Honor hold a teleconference with counsel to address the outstanding discovery deficiencies.

On January 28, 2020, MEF served its First Request for the Production of Documents Directed to Plaintiff Patricia McNulty, a copy of which is enclosed herein. To date, Plaintiff has not served written responses to the document requests nor has Plaintiff produced documents. The attorneys representing the parties in this action are currently litigating several related matters brought against MEF by several of Plaintiff's former MEF colleagues. Throughout the last months, we have raised this deficiency with Plaintiff's counsel, Seth Carson, Esq., numerous times, including as recently as this week. A copy of my email dated September 22, 2020 to Mr. Carson is enclosed. Nonetheless, Ms. McNulty has continued to disregard her discovery obligations. Meanwhile, to date, MEF has produced over 6000 pages.

Consistent with my obligations under Local Rule 26.1(f), I certify that I have made a good faith effort to resolve this dispute with counsel for Ms. McNulty.

Given that the deficiency is simply that Ms. McNulty has not responded to the document requests, we have used our discretion to present this matter to you by letter rather than by motion. We respectfully request that Your Honor hold a teleconference with Counsel to address this discovery issue.

Thank you for your time and attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "David J. Walton", written in a cursive style.

By: David J. Walton

DJW/lab
Enclosures

Cc: Seth D. Carson, Esq. and Sidney L. Gold, Esq. (via email)

From: Walton, David
Sent: Tuesday, September 22, 2020 10:53 AM
To: Seth Carson
Cc: Benson, Leigh Ann; Cavalier, Jonathan; Sidney Gold; Bill Rieser
Subject: MEF Barbounis & McNulty

Seth

Despite our numerous requests, you have failed to produce written responses to our documents requests in both the Barbounis and McNulty cases. These responses are inexplicably several months late. Please send us these responses by COB tomorrow or we will file a motion to compel in both cases.

Dave



David J. Walton
Shareholder
Cozen O'Connor

One Liberty Place, 1650 Market Street Suite 2800 | Philadelphia, PA 19103
P: 215-665-5547 F: 215-701-2110 C: 215.527.8459
[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)